

Jon V. Swenson (SBN 233054)
BAKER BOTTS LLP
620 Hansen Way
Palo Alto, CA 94304
Telephone: (650) 739-7500
Facsimile: (650) 739-7699
Email: jon.swenson@bakerbotts.com

John M. Taladay (*pro hac vice*)
Erik T. Koons (*pro hac vice*)
Charles M. Malaise (*pro hac vice*)
BAKER BOTTS LLP
1299 Pennsylvania Ave., N.W.
Washington, DC 20004-2400
Telephone: (202) 639-7700
Facsimile: (202) 639-7890
Email: john.taladay@bakerbotts.com
Email: erik.koons@bakerbotts.com
Email: charles.malaise@bakerbotts.com

*Attorneys for Defendants Koninklijke Philips N.V. and
Philips Electronics North America Corporation*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

This Document Relates to:

Sharp Electronics Corp., et al. v. Hitachi, Ltd., et al. No. 13-cv-01173:

Sharp Electronics Corp. v. Koninklijke Philips Elecs., N.V., No. 13-cv-2776 SC.

Case No. 07-5944 SC

MDL No. 1917

**DECLARATION OF TIFFANY B.
GELOTT IN SUPPORT OF
KONINKLIJKE PHILIPS N.V.'S AND
PHILIPS ELECTRONICS NORTH
AMERICA CORPORATION'S
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5(d)**

Date: None set
Time: 10:00 a.m.
Place: Courtroom No. 1

Hon. Samuel Conti

1 I, Tiffany B. Gelott, hereby declare as follows:

2 1. I am an associate with the law firm of Baker Botts L.L.P., counsel for Defendants
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, the
4 “Philips Defendants”). I am a member of the bar of the District of Columbia and I am admitted to
5 practice before this Court *pro hac vice*. I submit this declaration in support of the Philips
6 Defendants Administrative Motion to File Documents under Seal Pursuant to the Civil Local
7 Rules 7-11 and 79-5(d).

8 2. I have personal knowledge of the facts set forth herein and, if called upon, could
9 and would competently testify thereto under oath.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306)
11 (the “Stipulated Protective Order”).

12 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the
13 Philips Defendants seek to file the following documents or portions thereof under seal:

14 a. Portions of the Joint Defense Motion *in Limine* #10: Motion to Exclude
15 Evidence of Any Alleged CDT Price-Fixing Conspiracy (the “Motion”);
16 b. Exhibit 1 to Declaration of Tiffany B. Gelott in Support of the Motion
17 (“Gelott Declaration”), the Expert Report of Jerry Hausman, dated April
18 15, 2014; and
19 c. Exhibit 2 to the Gelott Declaration, interrogatories responses from Sharp
20 Electronics Corporation and Sharp Electronics Manufacturing Company of
21 America, Inc.’s First Supplemental Responses and Objections to
22 Defendants Hitachi Electronic Devices (USA), Inc. and Samsung SDI
23 America, Inc.’s First Set of Interrogatories, dated February 26, 2014.

24 5. The documents or portions of the documents submitted under seal contain either (a)
25 material designated by Sharp pursuant to the Stipulated Protective Order (Dkt. 306, June 18,
26 2008) as “Confidential” or “Highly Confidential” or (b) an analysis of, references to, or
27 information taken directly from material designated by Sharp pursuant to the Stipulated
28 Protective Order as “Confidential” or “Highly Confidential.”

6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on February 13, 2015 in Washington, DC.

/s/ Tiffany B. Gelott
Tiffany B. Gelott